

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

ASHLEY ALBERT, et al.,

Plaintiffs,

vs.

GLOBAL TEL\*LINK CORP., et al.,

Defendants.

Civil Action No. 8:20-cv-01936

**DECLARATION OF JANET HEROLD IN  
SUPPORT OF PLAINTIFFS' MOTION  
TO AMEND**

I, JANET Herold, declare as follows:

1. I am the Legal Director of Justice Catalyst Law (“JCL”), a nonprofit human and civil rights organization. As described on JCL’s website, JCL’s mission is to expand the legal system’s potential to provide meaningful accountability for the most powerful, and to bring justice and sustainable change to the communities that are most often left behind by our economic and legal systems, with attention to racial and other longstanding inequities.

2. I was hired as Legal Director in April 2021.

3. On September 30, 2021, the Court in this action issued its decision regarding defendants’ motion to dismiss.

4. Beginning on October 8, 2021, I directed staff to attempt to interview witnesses with knowledge of county and city procurements for providers of single-call telephone services to people detained or incarcerated in city or county prisons and/or jails.

5. Between October 8, 2021 and October 22, 2021, my staff attempted to reach more than 40 city and/or county officials in different jurisdictions across the country, along with

attempting to contact competitors and other witnesses with knowledge of procurement and/or industry practices relating to single-call products.

6. Between October 8, 2021 and October 22, 2021, staff with Justice Catalyst Law spent more than 60 hours attempting to identify facts relating to local and county procurement practices for single-call products and vendors.

7. From this investigation, staff for JCL elicited new facts and information relating to local procurement policies and practices that were incorporated into the Proposed Amended Complaint including, for example, information that was specifically pled in paragraphs 20, 70, 186-191, and 197-199 of the Proposed Amended Complaint.

8. I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 16, 2021

/s/ Janet Herold

Janet Herold  
Attorney for Plaintiffs